

EXHIBIT 8

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17 Attorneys for Plaintiff
18 BRIAN DOUGLAS LARSON

19 **UNITED STATES DISTRICT COURT**
20 **NORTHERN DISTRICT OF CALIFORNIA**
21 **SAN FRANCISCO DIVISION**

22 Case No. 3:12-cv-05726-

23 BRIAN DOUGLAS LARSON, on behalf
24 of himself and all others similarly
25 situated,

26 Plaintiff,

27 v.

28 TRANS UNION, LLC,

Defendant.

NOTICE OF DEPOSITION

TO: Stephen J. Newman, Esquire
Jason S. Yoo, Esquire
Stroock & Stroock & Lavan LLP
2029 Century Park East, Suite 1600
Los Angeles, CA 90067

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiff Brian Douglas Larson, by and through his undersigned counsel, will take the deposition of a Corporate Representative of Trans Union, LLC ("Trans Union"), who is knowledgeable of and can provide binding testimony as to:

(A) The total number of natural persons in the State of California to whom Defendant provided a Personal Credit Report containing an OFAC message, from September 11, 2010 to the present, and Defendant's methods for determining this number.

(B) Trans Union's policies and procedures for online communication of information to consumers concerning OFAC alerts or other OFAC-related information from February 2008 until the present, including but not limited to:

1. all format(s) in which Trans Union identifies OFAC records associated with consumers;
2. when, if ever, this format was changed by Trans Union;
3. why and how it was changed;

1 4. who directed and implemented any changes;

2 5. the alleged “coding error” described in your responses to Plaintiff’s
3 Interrogatory No. 9;

4 6. the current format in which Trans Union identifies OFAC records
5 associated with consumers.
6

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8 (C) Trans Union’s quality control measures and testing for online
9 communication of information to consumers concerning OFAC alerts or
10 other OFAC-related information from February 2008 until the present.
11

12 (D) The chronology and logistics of any changes that Trans Union made to
13 any of its file disclosure practices as a result of *Cortez v. Trans Union, LLC*,
14 617 F.3d 688 (3d Cir. 2010), from August 2010 until the present.
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16 (E) Trans Union’s sale of any OFAC alert or OFAC-related information
17 on any report sold to any third party about Plaintiff from February 2007 until
18 the present.
19

20 (F) Trans Union’s communications with Plaintiff from February 2008
21 until the present.
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25 The deposition will be taken by stenographic means and video before a
26 person duly authorized to administer oaths, at Francis & Mailman, P.C., Land Title
27
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1 Building, 19th Floor, 100 South Broad Street, Philadelphia, PA 19110,
2 commencing on September 23, 2014 at 10:00 am local time.
3

4 **FRANCIS & MAILMAN, P.C.**

5 
6
7 JAMES A. FRANCIS (*pro hac vice*)

8 JOHN SOUMILAS (*pro hac vice*)

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22 Dated: September 12, 2014
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16. Attorneys for Plaintiff

17. **UNITED STATES DISTRICT COURT**
18. **NORTHERN DISTRICT OF CALIFORNIA**

19. **BRAIN DOUGLAS LARSON,**
20. **on behalf of himself and all**
21. **others similarly situated,**

22. **Plaintiff,**

23. **v.**

24. **TRANS UNION LLC**

25. **Defendant.**

Case No.: 3:12-cv-05726-

CERTIFICATE OF SERVICE

26. I, John Soumilas, declare I am a citizen of the United States and employed in
27. Philadelphia, Pennsylvania. I am over the age of eighteen years and not a party to
28. the within-entitled action. My business address is 100 South Broad Street,
Philadelphia, PA 19110. On **September 12, 2014**, I electronically served
Plaintiff's Notice of Deposition pursuant to Rule 30(b)(6) of the Federal Rules of

1 Civil Procedure upon counsel of record:
2

3 Stephen J. Newman, Esquire
4 Stroock & Lavan LLP
5 2029 Century Park East, Suite
6 Los Angeles, CA 90067-3012

7 *Attorney for Defendant*

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9 Executed on **September 12, 2014**, at Philadelphia, PA.

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12 JOHN SOUMILAS
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